

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 23-11069 (CTG)  
)  
) (Jointly Administered)  
)  
) **Re: Docket Nos. 6, 174 and 311**

**CERTIFICATION OF COUNSEL REGARDING FINAL ORDER (I) AUTHORIZING  
THE DEBTORS TO (A) MAINTAIN INSURANCE COVERAGE ENTERED INTO  
PREPETITION AND PAY RELATED PREPETITION  
OBLIGATIONS AND (B) RENEW, SUPPLEMENT, MODIFY, OR  
PURCHASE INSURANCE COVERAGE, (II) APPROVING CONTINUATION  
OF THE SURETY BOND PROGRAM, AND (III) GRANTING RELATED RELIEF**

The undersigned hereby certifies the following:

1. On August 7, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance Coverage Entered Into Prepetition and Pay Related Prepetition Obligations and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Approving Continuation of the Surety Bond Program, and (III) Granting Related Relief* (the “Motion”) [Docket No. 6].

2. On August 9, 2023, the Court entered the *Interim Order (I) Authorizing the Debtors to (A) Maintain Insurance Coverage Entered Into Prepetition and Pay Related Prepetition Obligations and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage,*

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

(II) *Approving Continuation of the Surety Bond Program*, and (III) *Granting Related Relief* (the “Interim Order”) [Docket No. 174].

3. On August 21, 2023, the Court entered the *Second Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs*, and (II) *Granting Related Relief* (the “Second Interim Order”) [Docket No. 311].

4. The deadline to object to final relief on the Motion was August 31, 2023 at 4:00 p.m. Eastern Time.

5. The Debtors circulated a proposal form of final order to the Office of the United States Trustee, counsel to the Official Committee of Unsecured Creditors, the Junior DIP Lender, the B-2 Lenders, the ABL Agent, the United States Department of the Treasury, the UST Tranche A Agent and UST Tranche B Agent, Chubb Insurance, and Atlantic Specialty Insurance Company (the “Reviewing Parties”).

6. Attached hereto as Exhibit A is a revised proposed form of final order (the “Revised Proposed Final Order”) that has been circulated to the Reviewing Parties, which do not object to entry of the order. Attached hereto as Exhibit B is a redline of the Revised Proposed Final Order showing changes against the final order filed with the Motion.

7. Accordingly, the Debtors respectfully request entry of the Revised Proposed Final Order at the Court’s earliest convenience.

Dated: September 12, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

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